

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

Parents, Families, and Friends of Lesbians
and Gays, Inc., et al.)
Plaintiffs,) Case No. 2:11-cv-04212
v.) MOTION FOR LEAVE TO
Camdenton R-III School District, et al.) FILE OVER-LENGTH
Defendants.) SUGGESTIONS IN SUPPORT OF
) MOTION FOR PRELIMINARY
) INJUNCTION

**PLAINTIFFS' MOTION FOR LEAVE TO FILE OVER-LENGTH
SUGGESTIONS IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION**

Come now Plaintiffs, pursuant to Local Rule 7.1, and respectfully move this Court for Leave to File Over-Length Suggestions in Support of their Motion for Preliminary Injunction. In support of their motion, Plaintiffs states:

1. Plaintiffs have filed a Motion for Preliminary Injunction.
 2. Plaintiffs seeks leave to deviate from the page limitation of Local Rule 7.1(f), which provides, *inter alia*.

Suggestions in support of ... a motion shall be no longer than 15 double-spaced typewritten pages, exclusive of facts presented in accordance with Rule 56.1, without permission of the Court. ... Suggestions exceeding 10 pages in length shall have a table of contents and table of authorities.

3. The suggestions in support of Plaintiffs' motion for Preliminary Injunction require Plaintiffs to provide extensive background information explaining Internet filtering systems in general, the Defendant's Internet filtering system, and the

censorship affecting each of the four separate plaintiffs. Moreover, this motion involves important constitutional issues that impact the First Amendment rights of Plaintiffs and hundreds of Missouri students. Plaintiffs will be unable to adequately present their arguments in fifteen pages.

4. A copy of the proposed over-length suggestion and its exhibits is attached hereto.

WHEREFORE Plaintiffs move this Court for leave to file over-length suggestions in support of their motion for Preliminary Injunction and for such other and further relief as is appropriate under the circumstances.

Respectfully Submitted,

THOMPSON COBURN LLP

By _____ /s/ A. Elizabeth Blackwell _____

Mark Sableman #36276
A. Elizabeth Blackwell#50270

One U.S. Bank Plaza
St. Louis, Missouri 63101
314-552-6000
FAX 314-552-7000

msableman@thompsoncoburn.com
eblackwell@thompsoncoburn.com

Anthony E. Rothert, # 44827
Grant R. Doty, # 60788
American Civil Liberties Union of Eastern Missouri

454 Whittier Street
St. Louis, Missouri 63108
314-652-3114
FAX 314-652-3112

tony@aclu-em.org
grant@aclu-em.org

Joshua A. Block*
James Esseks*
LGBT Project
ACLU Foundation
125 Broad Street, Floor 18
New York, New York 10004
(212) 549-2600
FAX 212-549-2650

jblock@aclu.org
jesseks@aclu.org

* *Pro Hac Vice Motion to Follow*

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and I hereby certify that this document has been served, along with the Summons and Complaint, on the following non CM/ECF participants:

Camdenton R-III School District
Timothy E. Hadfield, Superintendent
119 Service Rd.
P.O. Box 1409
Camdenton, Missouri 65020-1409

Timothy E. Hadfield
38 Galahad Lane
Camdenton, Missouri 65020-3824

/s/ A. Elizabeth Blackwell